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7 United States of America

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9  
10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE EASTERN DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA

Case No. 1:23-cr-00074-JCC-BAM

13  
14 Plaintiff,

STIPULATION TO CONTINUE TRIAL

15 v.

16 GEORGE THOMAS,

17 Defendant.  
18  
19

20 IT IS HEREBY STIPULATED by and between the parties through their respective  
21 counsel that the trial scheduled to begin on March 3, 2025, may be continued until March 24,  
22 2025, at 8:30 a.m., before the assigned District Judge.

23 The government has produced initial discovery to defense counsel as well as  
24 supplemental discovery that the government has received from potential witnesses in connection  
25 with its trial preparation efforts. Discovery includes approximately 47,500 pages of electronic  
26 records such as police reports, photographs, and financial records. Discovery also includes  
27 approximately 80 catalytic converters from vehicles, five banker's boxes of hard copy records,  
28 police body camera footage for parts of several days, four covert recordings, a single cell phone

1 extraction, and interview memoranda. Defense counsel has received or been provided access to  
2 all discovery, and he has not encountered any issues or problems with the discovery so far.

3 The government believes that it may receive a small amount of additional discovery from  
4 potential witnesses in the coming weeks as it continues its trial preparation efforts. The  
5 government will produce this additional discovery to defense counsel as soon as it is received  
6 consistent with its discovery obligations.

7 Defense counsel will be ready to proceed with the trial by March 24, 2025. Accordingly,  
8 the parties agree that time under the Speedy Trial Act shall be excluded through March 24, 2025,  
9 in the interests of justice, including but not limited to, the need for effective defense preparation,  
10 defense investigation, and continuity of defense counsel pursuant to 18 U.S.C. §§ 3161(h)(7)(A)  
11 and 3161(h)(7)(B)(i) and (iv). The parties also agree that the ends of justice served by taking this  
12 action outweigh the best interests of the public and of the defendant to a speedy trial.

13  
14  
15 Dated: February 25, 2025

/s/ Kendall Simsarian

Kendall Simsarian  
Counsel for George Thomas

16  
17  
18 Dated: February 25, 2025

/s/ Joseph Barton

Joseph Barton  
Justin Gilio  
Assistant United States Attorneys

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Plaintiff,

v.

GEORGE THOMAS,

Defendant.


Case No. 1:23-cr-00074-JCC-BAM

ORDER TO CONTINUE TRIAL

Upon the parties' stipulation and for good cause shown, the trial scheduled to begin on March 3, 2025, is continued until March 24, 2025, at 8:30 a.m., in Courtroom 5 before the District Judge John C. Coughenour. The period through March 24, 2025, inclusive, is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

IT IS SO ORDERED.

DATED this 25th day of February, 2025.

  
THE HONORABLE JOHN C. COUGHENOUR